

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BIZUAYEHU YLIMA BAYEH,

Plaintiff,

v.

Civil Action No. 3:22-cv-01008-C

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

**DEFENDANTS’ THIRD UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND**

In this case, Plaintiff Bizuayehu Ylima Bayeh seeks a writ of mandamus to compel U.S. Citizenship and Immigration Services (USCIS) to adjudicate a Form I-485, “Application to Register Permanent Residence or Adjust Status.” *See* Doc. 1 at 2. On May 31, 2022 and July 11, 2022, the Court granted Defendants’ unopposed motions for, respectively, a 45-day and a 30-day extension of time to answer or otherwise respond to the complaint, due to a request for evidence that USCIS issued to Plaintiff in connection with the Form I-485 and USCIS’s processing of Plaintiff’s response to that request. *See* Docs. 8–11. Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants respectfully move the Court for an additional extension of time to answer or otherwise respond to the complaint—an additional 60 days—which would extend the response deadline from August 10, 2022 to October 11, 2022. The reason for this third extension request is that, on July 26, 2022, USCIS issued a notice scheduling Plaintiff for an

interview on August 25, 2022. USCIS expects that, by October 11, 2022, it will have either completed adjudicating the Form I-485, rendering the lawsuit moot, or at least be in a significantly better position to determine what additional steps may be necessary before completing adjudication. Plaintiff does not oppose this extension request. Therefore, Defendants respectfully move the Court for a 60-day extension of time to answer or otherwise respond to Plaintiff's complaint, from August 10, 2022 to October 11, 2022.

Respectfully submitted,

CHAD E. MEACHAM
UNITED STATES ATTORNEY

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney
Texas Bar No. 24075989
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214-659-8737
Facsimile: 214-659-8807
lisa.hasday@usdoj.gov

Attorneys for Defendants

Certificate of Conference

I certify that, on July 27, 2022, I conferred with Plaintiff's counsel regarding this motion, and counsel stated that Plaintiff does not oppose the motion.

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney

Certificate of Service

On July 27, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Lisa R. Hasday
Lisa R. Hasday
Assistant United States Attorney